

REMARKS

In response to the Office Action dated September 19, 2007, claims 1, 8 and 15 have been amended. Claims 1-20 are in the case. The Applicants respectfully request further examination and reconsideration in view of the above amendments.

The Office Action rejected claims 1-7 and 15-20 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Adler (U.S. Patent Publication No. 2002/0169658) in view of Lindell (U.S. Patent No. 6,622,056). The Office Action also rejected claims 8-14 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Adler (U.S. Patent Publication No. 2002/0169658) in view of Lindell (U.S. Patent No. 6,622,056) and further in view of Starr et al. (U.S. Patent No. 6,947,905).

The Applicants respectfully traverse these rejection based on the amendments to the claims and the arguments below.

Specifically, the Applicants newly amended claims now include an inventory table that accepts delivery frequency, review period and service level for each terminal demand node and each internal demand node for automatically generating a realistic supply chain model. Support for these newly added features can be found in FIG. 4D and paragraph [0153] of the Applicants' published patent application (U.S. Patent Publication No. 2003/0078831).

In contrast, the combined cited references simply disclose a system and method for modeling and analyzing strategic business decisions (see Abstract of Alder), a supply chain network control system (see Summary of Lindell) and a system for displaying planning information associated with a supply chain that includes an enterprise model, a planning engine, and a presentation interface. Although the combined references disclose a model that includes demand requirements and inventory carrying costs (see Starr et al.), the combined references are clearly missing the Applicants' newly amended claimed inventory table that accepts delivery frequency, review period and service level for each terminal demand node and each internal demand node for automatically generating a realistic supply chain model.

For instance, the combined references specifically disclose "contractual demand fulfillment requirements, order commitments" and with regard to inventory, "initial on-hand inventories" and "maximum and minimum inventory amounts." However, in the

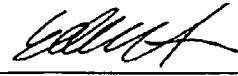
Applicants' claimed invention, **the inventory table accepts delivery frequency, review period and service level** for each terminal demand node and each internal demand node for automatically generating a realistic supply chain model. Further, this new feature in combination with the Applicants' claimed entered values that correspond to a **boundary condition** for the supply chain analysis and a **bill of materials** table for parts and a **materials for product table** to track **product forms and intermediate assemblies of products** when a part transforms a product from one form to another of claim 8 is unquestionably not disclosed, taught or suggested by the combined cited references.

Therefore, since the combined references are missing features of the Applicants' claimed invention, the combined references cannot render the Applicants' invention obvious. This failure of the cited reference to disclose, suggest or provide motivation for the Applicants' claimed invention indicates a lack of a *prima facie* case of obviousness and, thus, the obviousness rejection should be withdrawn (MPEP 2143).

Last, with regard to the dependent claims, since they depend from the above-argued respective independent claims, they are therefore patentable on the same basis. (MPEP § 2143.03).

Thus, it is respectfully requested that all of the claims be allowed based on the amendments and arguments. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. Additionally, in an effort to further the prosecution of the subject application, the Applicant kindly requests the Examiner to telephone the Applicant's attorney at (818) 885-1575. Please note that all mail correspondence should continue to be directed to Hewlett Packard Company
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Respectfully submitted,
Dated: December 19, 2007



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